

**REMARKS**

In the Final Office Action<sup>1</sup>, the Examiner rejected claims 1-15 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,828,374 to Coleman et al. ("*Coleman*") in view of U.S. Patent No. 5,828,374 to Schirmer et al. ("*Schirmer*") and further in view of U.S. Patent No. 5,714,971 to Shalit et al. ("*Shalit*").

In a telephonic interview conducted August 7, 2007, Applicants' representative explained the failings of the cited references with respect to dependent claim 3. The Examiner appeared to agree that the cited references could not be relied upon as disclosing the subject matter of claim 3. Applicants have canceled claim 3 and amended claim 1 to incorporate subject matter generally corresponding to that of canceled claim 3. Therefore, for at least the reasons discussed in the interview and for the reasons outlined below, Applicants respectfully traverse the rejection of claims 1-15 under 35 U.S.C. § 103(a).

Independent claim 1 recites, for example, a computer program product comprising instructions operable to cause data processing apparatus to:

receive user input from a user to establish a decoupled mode when a key is pressed and held by the user, and to establish a normal mode when the key is released by the user; and

receive navigation input, distinct from the user input, to navigate from one user interface element to another user interface element, where in the normal mode, navigation to an independent element with the navigation input is sufficient to cause the independent element to become

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<sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

the selected element, and where in the decoupled mode, navigation to an independent element does not change which, if any, of the independent elements is the selected element.

(emphasis added). The cited references fail to teach or suggest the claimed “establish a decoupled mode when a key is pressed and held by the user, and to establish a normal mode when the key is released by the user.”

*Coleman* discloses a help index that can be searched using an “alpha scroll bar” (*Coleman*, Fig. 8, and col. 10, line 51 to col. 11, line 14). Letters on the alpha scroll bar can be selected by a number of methods, including “depressing a desired character key on the keyboard” (*Coleman*, col. 11, lines 24-25, FIGS. 10 and 11). Letters on the alpha scroll bar can also be selected by “placing [a] cursor over a portion of slider 175, depressing [mouse] switch 46 and dragging the cursor and slider over the desired letter ... [and] releas[ing] [mouse] switch 46,” (*Coleman*, col. 11, lines 20-23). When a letter in the alpha scroll bar is selected, help index entries beginning with the selected letter are displayed (*Coleman*, col. 11, lines 64-66).

Amended claim 1 incorporates recitations from canceled dependent claim 3. In addressing the recitations of canceled claim 3, the Examiner asserts that depressing the “F” key in *Coleman* corresponds to the claimed “establish a decoupled mode when a key is pressed and held by the user,” and that releasing the “F” key in *Coleman* corresponds to the claimed “establish a normal mode when the key is released by the user a normal mode or a decoupled mode of user interface operation” (Office Action at p. 9). The Examiner also alleges that dragging the cursor and slider corresponds to the

claimed “navigation input,” and that the letters in *Coleman* correspond to the claimed “independent element” (Office Action at p. 3).

However, the function of the “F” key as disclosed in *Coleman* does not correspond to the claimed “key.” When the claimed key is “pressed and held” to establish the claimed “decoupled mode ... navigation to an independent element does not change which, if any, of the independent elements is the selected element.” In contrast, *Coleman* does not disclose that pressing and holding the “F” key while dragging the cursor and slider to a second letter has any bearing on whether the second letter will be selected. Rather, as discussed, *Coleman* discloses pressing and holding the “F” key as one method of selecting a letter, and dragging the cursor and slider as another method of selecting a letter, without ever discussing how the system would operate if the user combined both methods of selecting a letter by using both the mouse and a key on the keyboard.

Moreover, claim 1 requires that “navigation to an independent element with the navigation input is sufficient to cause the independent element to become the selected element,” and, as discussed, the Examiner alleges that dragging the cursor and slider corresponds to the claimed “navigation input.” However, *Coleman* discloses that the user releases the mouse switch before the desired letter becomes selected (*Coleman*, col. 11, lines 20-24). Therefore, by alleging that “dragging the cursor and slider” corresponds to the claimed “navigation input,” the Examiner is necessarily alleging that releasing the mouse switch is also part of the navigation input. Otherwise, simply

moving the slider without releasing the mouse switch is not “sufficient to cause the independent element to become the selected element,” as claim 1 recites.

The Examiner also relies on *Coleman*’s disclosure of releasing the mouse switch as corresponding to the claimed user input (Office Action at p. 9). However, releasing the mouse switch in *Coleman* cannot correspond to both a part of the claimed navigation input and the claimed user input, as claim 1 requires that the navigation input is “distinct” from the user input. Thus, the Examiner’s reliance on the release of the mouse switch as corresponding to both the claimed user and navigation inputs is incorrect. Therefore, *Coleman* fails to teach or suggest the claimed input “to establish a decoupled mode when a key is pressed and held by the user, and to establish a normal mode when the key is released by the user,” as recited by independent claim 1.

*Schirmer* discloses a method for managing and presenting information for a group of data objects which can be associated with other data objects (*Schirmer*, abstract). A user can select a data object, and be presented with a number of other data objects that are related to the selected data object (*Schirmer*, col. 6, lines 60-64, and Fig. 1). A user can also filter the related objects based on criteria such as secondary objects (*Schirmer*, col. 14, line 57 to col. 15, line 42).

The Examiner contends that *Schirmer*’s disclosure of selecting objects corresponds to the claimed “navigation to an independent element with the navigation input is sufficient to cause the independent element to become the selected element” (Office Action at p. 4). To select a data object in *Schirmer*, the user must first navigate to, and then click on an object (*Schirmer*, col. 14, lines 27-30). However, *Schirmer* does

not disclose a key used establish modes analogous to the claimed decoupled or normal modes. Therefore, *Schirmer* fails to teach or suggest the claimed input “to establish a decoupled mode when a key is pressed and held by the user, and to establish a normal mode when the key is released by the user,” as recited by independent claim 1.

*Shalit* discloses dragging an object to a “split bar box” which causes a second “pane” to open in a window (*Shalit*, col. 5, lines 5-10). The second pane displays the contents of the dragged object (*Shalit*, col. 5, lines 19-21). However, *Shalit* does not disclose a key used establish modes analogous to the claimed decoupled or normal modes. Therefore, *Shalit* fails to teach or suggest the claimed input “to establish a decoupled mode when a key is pressed and held by the user, and to establish a normal mode when the key is released by the user,” as recited by independent claim 1.

Because the cited references fail to teach or suggest the claimed “establish a decoupled mode when a key is pressed and held by the user, and to establish a normal mode when the key is released by the user,” no *prima facie* case of obviousness has been established with respect to independent claim 1.

Although of different scope, independent claims 8 and 15 recite features similar to those of claim 1 already discussed. Claims 1, 2, and 4-7 depend from claim 1, and claims 9 and 11-14 depend from claim 8. Applicants cancel claims 3 and 10, rendering the rejection of those claims moot. Therefore, Applicants request that the rejection of the pending claims under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

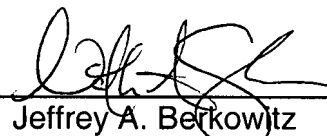
In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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